

I. COMMERCIAL PLAN REVIEW

A. PROFILE

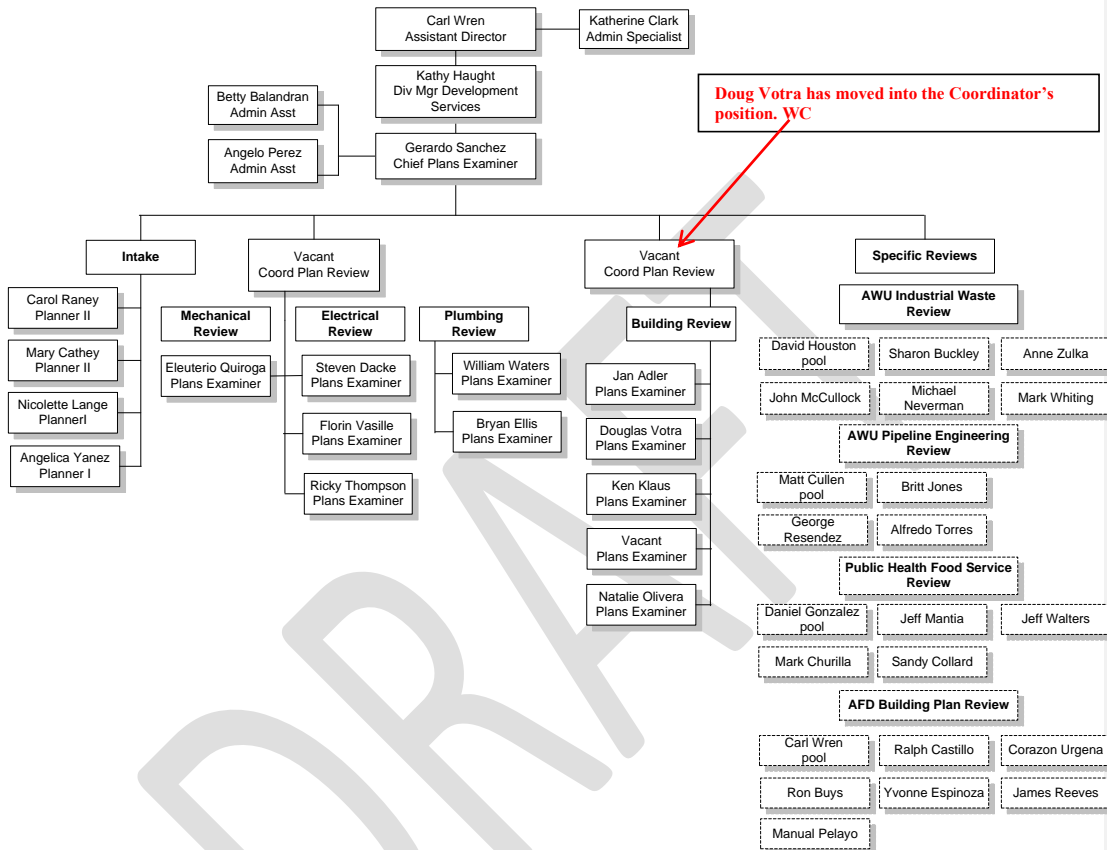
The Commercial Plan Review Section is responsible for the review and approval of all commercial and multi-family (3 or more units) building applications for new construction, remodels, revisions to approved permits, changes of uses and certificates of occupancy/compliance. Building plans are reviewed for compliance with building, electrical, mechanical, plumbing, energy and design standards found in the various adopted Codes. The review process also includes review by other departments including review of Fire Code requirements by the Fire Department, health review by Austin/Travis County Health and Human Services Department and industrial waste and pipeline review by Austin Water Utility. In addition to plan review services, this section also provides consulting services by Planners to help customers understand the review process and conduct preliminary plan review meetings to advise customer of the items that must be included with their submittals. The Section also offers a Quick Turn-around Service for small interior remodel projects that can generally be approved on the same day as submittal. As an additional service to customers, the staff offers customers the opportunity to process building, subdivision and site plans concurrently.

Organization

The Section is comprised of 19.5 full-time equivalent positions from the Planning and Development Review Department. The organization for the Commercial Plan Review section is shown in Figure __ includes positions assigned to other departments and agencies. Job positions descriptions for those positions in the Planning and Development review Department are shown in Table __.

Comment [C1]: Concurrent reviews are a required option under the Land Development Code and are not just done as a courtesy.
Wren/Haught

Figure 38
Organization of Commercial Plan Review Section



Comment [WC2]: There are several errors in this organizational chart due to the filling of vacant positions. "Carl Wren" needs to be removed from the AFD section and several names need to be added if this is to be accurate.

Comment [MM3]: Disclaimer for Org chart

Staffing

Table
Job Positions in Commercial Plan Review Section

Position Title	Number of Positions	Responsibilities	Reports To
Assistant Director/ <u>Building Official</u>	1	Manages Building Inspection, Commercial Building Review, Permit Center, Residential Review, and Site/Subdivision Inspections	Director
Dvpt Srv Mgr	1	Manages Commercial Review Division	Assistant Director

Position Title	Number of Positions	Responsibilities	Reports To
Chief Plans Examiner	1	Manages the Plans Intake staff and the Plans Examiners who perform technical code reviews.	Dvpt Srv Mgr
Admin. Asst	2	Provides administrative support to Chief Plans Examiner and <u>intake</u> staff.	Chief Plans Examiner
Intake			
Planner II	2	Provides initial customer contact for receiving plans and applications. Performs initial plan completeness and zoning reviews on more complex projects prior to acceptance for formal review. Reviews commercial plans <u>to determine if they qualify for compliance</u> for the Quick Turn Around review <u>process</u> .	Chief Plans ExaminerCoord., Plan review
Planner I	2	Provides initial customer contact for plan submittals and enters application data into AMANDA, collects plan review fees, fees,	Chief Plans ExaminerCoord., Plan Review
Coord, Plan Review	1	Provides direct supervision for commercial mechanical, electrical and plumbing plans examiners, coordinates problem resolution with other departments and agencies (currently vacant).	Chief Plans Examiner
Mechanical Review			
Plans Examiner	1	Performs plan reviews to confirm compliance with adopted Mechanical Code and local amendments.	Coord, Plan Review
Electrical Review			
Plans Examiner	3	Performs plan reviews to confirm compliance with adopted Electrical Code and local amendments.	Coord, Plan Review
Plumbing Review			

Position Title	Number of Positions	Responsibilities	Reports To
Plans Examiner	2	Performs plan reviews to confirm compliance with adopted Plumbing Code and local amendments.	Coord, Plan Review
Building Review			
Coord, Plan Review	1	Provides direct supervision for commercial building plans examiners, coordinates problem resolution with other departments and agencies (currently vacant).	Chief Plans Examiner
Plans Examiners	5	Performs plan reviews to confirm compliance with adopted Electrical Code and local amendments.	Coord, Plan Review
SPECIFIC REVIEWS, NON PDRD			
<u>AWUAWA</u> Industrial Waste Review			
<u>AWU staff?</u>	6	Review commercial projects to assess projects impact on industrial wastewater discharge system; determine if pretreatment program is required	
<u>AWUAWA</u> Pipeline Engineering Review			
<u>AWU staff?</u>	4	Performs plan reviews for restaurants and other food handling facilities for compliance with local and state health codes	
Public Health Food Service Review			
<u>Public Health Food Service staff?</u>	5	Performs plan reviews for restaurants and other food handling facilities for compliance with local and state health codes	
AFC Building Plan Review			
Fire Protection Engineers	7	Reviews commercial plans for compliance with the adopted Fire Code and NFPA	Fire Marshal

Comment [MM4]: Please verify your data. We believe your number is too high

Comment [MM5]: Please verify your data. We believe your number is too high

Position Title	Number of Positions	Responsibilities	Reports To
		Standards	
TOTAL	44		

B. POSITIVE FINDING

- The Commercial Plan Review Division has published code interpretations in clear and consistent format that is readily available to the customers via the website.
- Commercial zoning reviews have been completing reviews within established target times over 90% of the time.
- The Commercial Plan Review staff and Fire Department plans examiners were located on the same floor of One Texas Center in an effort to enhance communications.
- A comprehensive flow chart has been prepared to assist Commercial Plan Review staff while performing plan reviews.

C. ORGANIZATION ISSUES

Management

In comparison with many other jurisdictions we have reviewed the current organizational structure of the Commercial Review Division suggests an excessive number of levels between the Assistant Director and the first-level employees. While we certainly support the concept of limiting the span of control of supervisors to a reasonable number of employees based on their assigned work (i.e. 5 to 10 employees per supervisor), this Section appears to have an abundance of manager positions. It is recognized that this Section has been operating for a significant period of time with many supervisor and manager position vacancies. With the recent appointment of an Assistant Director and Chief Plans Examiner, it is no longer clear what role the Division Manager for Development Services will serve.

- 1. Recommendation: The organizational structure of the Commercial Review Division should be reviewed to determine if a management position could be relocated or eliminated.**

Employee Qualifications

A review of the history of this Section indicates that the task of providing technical plan review for commercial projects has evolved from a very minimal review in prior to 1967,

Comment [BR6]: We should talk about this position some more. I don't think it is contributing much but it may be one of Sue's political appointments. This person has no technical knowledge of the programs she is managing.

Comment [MM7]: Re: Comment (BR6) comment above: Do not understand relevance of the comment.

Comment [WC8]: Some of the more challenging aspects of plan review in the City of Austin regard zoning issues rather than technical knowledge of the building codes. The incumbent in this position is well versed on the zoning related aspects of construction permitting and brings organizational memory to these and other issues. I would like to better understand the background for this recommendation. Wren

Comment [WC9]: I am still learning the processes in PDRD. But, in addition to the zoning issues noted above, unless the proposal for the chief plans examiner to supervise both residential and commercial review is implemented, the elimination of this position would likely leave a hole in the chain of command. As noted in my comments to the residential plan review chapter, I believe there is more to be gained by increasing the skill set of the division manager. I need to see a suggested organizational chart from the Zucker staff. Wren

Comment [PZ10]: Okay or should we just go ahead and say this relocate or eliminate?

to plan review by inspectors in the field to ultimately creating a plan review staff that reviews building, structural, plumbing, mechanical, electrical, fire and energy code requirements. During this timeframe the adopted codes have expanded tremendously and have become technically complex. Other jurisdictions comparable to Austin in population and development type have responded to the increases in code requirements and complexity by continuously increasing the minimum qualifications for those employees hired to perform commercial building plan reviews. These comparable jurisdictions have established minimum requirements that create a commercial plan review Section staffed by Professional Engineers, including Structural Engineers, and Licensed Architects. In addition, these employees have demonstrated their abilities to conduct comprehensive commercial plan reviews by achieving recognition as a Certified Commercial Plans Examiner in their assigned discipline through a nationally recognized organization such as ICC. The current job descriptions for the Plans Examiner and Chief Plans Examiner positions do not include a requirement to be a Professional Engineer or Licensed Architect nor do they state any specific requirements for Certifications. We believe that a large city like Austin should have a commercial plan review section staffed with Professional Engineers and Architects that have also been certified as Commercial Plans Examiners. Those individuals performing plan reviews for mechanical, plumbing, electrical and energy code requirements need not be Professional Engineers or Licensed Architects but should possess Certification as Plans Examiners in their assigned fields.

2. **Recommendation:** The minimum qualifications in the Job Description for Plans Examiner should be increased to better reflect the demands of the Commercial Plans Examiner.

Management and Supervision

During the last year the Commercial Plan Review Section has experienced significant challenges due to the lack of staffing in key supervisor and manager positions. With the recent appointment of an Assistant Director and internal promotion of the Chief Plans Examiner and building code plan review coordinator, the Department has made significant progress in completing supervisory team for this Section. However, the two one of the first line supervisor positions, Plan Review Coordinators, remains vacant. These positions are critical to an effective day-to-day operation of the plan review section.

3. **Recommendation:** The Department should immediately recruit and hire staff to fill the two (2) vacant Plan Review Coordinator positions.

It has also been communicated to us through employee surveys and interviews that managers and supervisors as a group seem to be reluctant to provide timely responses to staff requests for direction on the proper interpretation of specific code requirements. We are aware that employees should be expected to perform basic research and develop recommendations for a supervisor to endorse rather than simply expect supervisors to

Comment [WC11]: I generally agree with the comment on professional staffing, especially with the need to include structural engineering as a plan review discipline. As noted below, it is our intent to begin the process of credentialing our staff by requiring them to obtain plans examiner certifications in their respective disciplines. Wren

Comment [WC12]: I agree with these comments but do not think the Zucker recommendation clearly reflects the extent of change being proposed. It is my intent to require all plan review staff to obtain plans examiner certification(s) in their respective plan review discipline(s) and/or an appropriate license as a design professional (PE, RA, etc.).

Comment [WC13]: Possible wording change to read "...should be expanded to include the credentials that will be required for candidates and incumbents for these positions which would better reflect ..."

Comment [WC14]: The "Building Plan Review Coordinator" position has also now been filled. Staff

Comment [BR15]: I'm thinking a manager position for the other department reviews should be a higher position to oversee the additional areas of responsibility. These vacancies are basically first-line supervisor positions. I have placed a lot more responsibility on these positions to see that quality control measures are implemented and that useful performance evaluations are created. I'm concerned that the new Asst. Director (Carl Wren) may be sucked into too many lower level decision making roles unless he has positions he can hold accountable for those decisions. Their organization structure had been so depleted for so long it created a real void. I'm not sure if staff remembers know how a chain-of-command structure for decision making is supposed to work.

Comment [WC16]: A suggested organization chart would be helpful in my efforts to understand how this recommendation impacts the staff.

Comment [PZ17]: That would make 7 new positions. Really needed?

Comment [PZ18]: Sorry, I miss read this, these are the two vacant positions which should be filled. Then if we add the four special department's. A manager for that position could be at this same level or higher?

perform all research. The problem identified to us was an unwillingness to take responsibility for making a decision. This problem may be somewhat attributable to the number of vacant supervisor and manager positions that have been vacant for extended periods, but employee comments suggest that this is problem that has been engrained in the culture of the organization for a long time.

4. Recommendation: Managers and Supervisors should be urged to be more decisive when responding to requests for direction from staff.

Performance Standards

The table below contains the performance standards that the Department has established for the Commercial Plan Review Division. Similar to the comments provided elsewhere regarding the City's choice of Performance Standards, we believe that several of these measures need to be further refined if they are to be useful performance indicators and those that simply reflect a change in activity level should be removed unless they can be restated as a performance standard. We generally don't encourage jurisdictions to use an average as an indicator of performance. Frequently the use of an average fails to highlight those cases that deserve special attention. These cases become absorbed in the average number when there are large numbers of activities that have very low numbers. We prefer to encourage jurisdictions to utilize a percentile approach that states that a chosen performance target will be achieved 90% of the time. With the exceptions of the last two Performance Standards identified in the table, there are no indications of the target level to be achieved.

See Chapter II where we indicate averages should not be used for performance standards and standards should be met 90% of the time.

Comment [WC19]: There has been a lack of consistency in applying the code to various projects. Part of the problem may also be a lack of general code knowledge at the supervisory and manager levels. Additional training would likely help supervisors and managers to understand the code development process and the background for specific sections and provisions in the codes. This higher level of training would possibly give supervisors and managers more confidence in answering questions from their personnel.
Wren

Table
Performance Standards for Commercial Building Plan Review

	2011	2012	2013	2014*	2015
FTEs	16.5	19.5	19.5	19.5	20.5
Average initial review time for new commercial (in days)	17	33	33	33	
Cycle time for new commercial (in days)	75	77	96	95	
# of new commercial applications reviewed	324	395	457	464	500
Ratio new commercial apps/FTEs	19.6	20.2	23.4	43.6	24.4
FTEs based on benchmark comparison	benchmark	20.2	23.3	43.4	25.5
# health applications received and processed	444	477	523	533	600
% initial commercial plan reviews completed within LDC mandated time of 21 days	56%	22%	25%	23%	35%
% of on-time commercial zoning reviews	92%	92%	91%	90%	

Comment [MM20]: Where is reference for asterisk?

Comment [PZ21]: Why the big drop?

Comment [MM22]: Re: Comment (PZ21) – We don't view this as a big drop. Don't understand

Comment [PZ23]: Do we deal with Health or do we need to?

Comment [MM24]: Is there any data for 2015?

Comment [MM[O25]: Current Year Estimate. Haught

Comment [PZ26]: This can't be right?

Comment [BR27]: This is similar to the information you followed up on with Leslie a couple weeks ago. It's crap, but it is what the Council approved in their 2015 budget. Yet another example of how management isn't even looking at the data they generate and how it should be used in the decision making process.

Comment [PZ28]: This is just an estimate and it seems to say that the 80% was baloney. We need to get to 90%

Comment [MM29]: Is there any data for 2015?

As an example of refining the data to more appropriately represent a performance standard, the tracking of Full Time Employees (FTEs) by year should be combined with the data for the number of new commercial applications reviewed to establish a ratio that reflects the number of reviews performed per FTE per year. The Performance Standard could be that staffing levels are established to achieve a ratio of reviews to FTEs of 20.2.

Several of the Performance Standards above attempt to measure an elapsed time that includes time that is not within the control of the Department. An example would be the tracking of the total cycle time for plan review on new commercial projects. While it is appropriate to monitor the time the City had control of the plans during the review process, such as is reflected in the second row of information in the table, the total cycle time includes the time that the plans were under the exclusive control of the applicant. A preferable way to present this information is to identify the specific target time for review that should be achieved 90% of the time and then measure how frequently (%) that the target was met. In the case of plan reviews we have recommended times in the table below for initial review and have recommended these times be reduced by 50% for each resubmittal.

The Commercial Plan Review Performance Standards include a measurement for new commercial applications; however, it is not clear whether this represents all applications for commercial review including commercial remodels and repairs or just new buildings. As projects such as remodels can represent a significant portion of the total plan review workload it is appropriate that they be included and the description of projects be properly identified in the performance standards table.

Comment [C30]: This measure is just for new construction. Haught

5. Recommendation: The category descriptions in the Performance Standards for Commercial Plan Review should be modified to clearly reflect what is being measured.

The inclusion of the number of Health applications reviewed in the table but not similar entries for Austin Fire, Austin Water and Austin Energy application reviews is confusing. On the organization chart for the Commercial Review Division these employees are identified as not part of PDRD and collectively as the Specific Review group. We would recommend that all of the outside agencies be included in the table and that the performance standards be written in the form of achieving a specified turnaround time at least 90% of the time. Based on interviews with staff from the other reviewing groups, these representatives indicated they consistently complete their reviews prior to Building staff finishing their reviews. The amended budget report for FY 13-14 Fire Plan Review indicated they expected to meet their plan review turnaround target times only 60% of the time. At this rate, Fire staff still believes they complete their reviews approximately one week earlier than Building staff.

6. Recommendation: The Performance Standards table should include turnaround time performance standards for Austin/Travis County Health, Austin Fire, Austin Water and Austin Energy (Specific Review Group).

It was clear from our reviews that the current staffing levels fail to provide sufficient resources to consistently meet the desired performance standards. We have made numerous recommendations throughout this report identifying the need to add inspection and building plan review staff in order to achieve the City's publicly stated performance expectations. Our focus has been on those areas most frequently identified as failing to meet customer expectations. However, with the implementation of our recommendations we anticipate that those functions in building inspection and plan review will demonstrate a significant improvement in overall performance. It is very conceivable the performance of these sections will no longer represent the "weak link" in the process. With additional tracking of the performance of the other departments involved in the plan review process it will be readily apparent when the performance in those sections becomes the "bottleneck" in the process. At that point in time it will become management's responsibility to increase resources as appropriate to achieve the performance standards the customers expect.

Comment [C31]: It would seem to be better to base this comment on actual data from AMANDA than on opinions/interviews. Haught

Comment [BR32]: I agree with your direction. This recommendation was more about the need to track and report on this additional information in order to get a more complete view of what was occurring across the board. I think regardless of whether they reassign duties or not, there should be a tracking of performance in these areas.

Comment [C33]: PDRD has no ability impact the performance of AFD, Health, or the Water Utility personnel. As currently constituted, PDRD should not be held accountable for these reviews. Wren

Comment [PZ34]: How should we handle this. Keep in mind that I recommend that except for Travis County they no longer review. Maybe we say, until such time as the MOUs are completing transferring all reviews to PDRD use the standards Or? I want to really push this one, even though we are not likely to get all we want.

7. Recommendation: Enhanced tracking of turnaround times for the Specific Review Groups should be closely monitored by Management to determine when additional staff resources should be allocated.

The Performance Standard table includes a measure for how frequently the Commercial Section meets what is described as the Code mandated turnaround time for initial commercial plan review. We do believe it is important to establish a turnaround time standard for initial plan reviews; however, we were unable to locate any section in the Municipal Code that establishes a mandated turnaround time for the initial review of commercial building plans. The only reference to a mandated 21-day turnaround time applies to the review of preliminary plans or in responding to a request for a development assessment. Reviewing the table data indicates that the Section has failed to meet this supposed mandate, in some cases by substantial margins, during any of the 4 previously recorded years. As written in the Performance Standard table this Performance Standard would appear to be a very strong indicator of the overall effectiveness of the Section. Our customer surveys and stakeholder meetings revealed that customers are similarly under the belief that this 21-day plan review turnaround target is mandated for commercial plan reviews. These individuals expressed great frustration over what they believed was the City's practice of ignoring this mandated requirement. This perception has contributed to an often-expressed feeling of mistrust when dealing with City staff. We believe it is important to establish an appropriate performance standard for initial plan reviews of commercial projects, but it is equally important to resolve what appears to be a misunderstanding about the validity of a mandated 21-day review requirement.

Comment [C35]: This mandate is clearly written in Section 25-11-63 of the LDC.
Haught/Wren

8. Recommendation: The reference to a 21-day mandate for commercial plan review turnaround should be eliminated from the Performance Standard table for the Division.

Comment [C36]: This mandate is clearly written in Section 25-11-63 of the LDC.
Haught/Wren

9. Recommendation: The Department needs to work with the Law Department Attorneys Office to confirm the applicability of the 21-day mandate for initial plan review turnaround and publish their finding on the web site to promote customer awareness.

Comment [C37]: This mandate is clearly written in Section 25-11-63 of the LDC.
Haught/Wren

In our studies we recommend that plan review turnaround times be prominently posted and that extraordinary efforts be taken to confirm these targets are consistently met. Further, we believe that it is appropriate to establish different plan review turnaround targets for projects based on their size and complexity so as to avoid having small projects unnecessarily wait behind large projects. To a certain degree this principal has been incorporated into the Department's practice of establishing 7-day projects and 21-day projects. Recognizing that we have recommended elsewhere that these standards be relabeled to reflect business days rather than calendar days (5 days and 15 days respectively), we recommend that those projects currently labeled 21-day review projects be further differentiated into categories representing projects above \$1,000,000 valuation and those below that threshold. Our recommendation is that projects with valuations

Comment [MM38]: Do you mean this information should be readily available to the public but not mandated by the code? Please clarify.

above \$1,000,000 be completed in 20 business days and those below \$1,000,000 be completed within 15 business days. Also, we support a position that would establish turnaround times for subsequent plan review to be approximately one-half the original submittal target time. We recommend the plan review turnaround times be adjusted as reflected in the table below in order to be consistent with those standards we see in other jurisdictions with characteristics similar to Austin. The Performance Standard should indicate these target time frames are expected to be met at least 90% of the time.

The Performance Standards for Commercial Plan Review are ~~s~~Shown in Chapter __, Table __.

As reflected in the approved Budget for FY 14-15, the Department only expects to reach their established target review times 35% of the time for the coming year. Establishing a performance standard that the Department does not intend to meet at least 90% of the time has little relevance. The Department needs to either request additional staffing sufficient to consistently meet the established performance standard or dramatically reduce the standard to reflect the actual performance levels. Continuing the current practice simply undermines the public's trust in the organization.

In Chapter III, we have calculated the backlog for commercial plan checks and calculate that there is a backlog of 79 applications. Until this backlog is removed it will not be possible to use performance standards for this function. In recommendation __ we indicate a variety of ways to remove the backlog. The Commercial Plan Check Divisions currently using overtime, two temporary staff but these will not be sufficient to remove the backlog.

Staffing Levels

A review of the Commercial Plans Review sections performance indicated that the current target date of 21 days for initial plan review is only being reached 25% of the time and the average length of time is 40 days. As stated above, we believe there is little value in advertising a turnaround time of 21 days when it is rarely met. Given the size and complexity of commercial projects currently being submitted for plan review in Austin we believe a more appropriate target turnaround time should be 28 calendar days (20 business days). This standard is consistent with the recommendations we have provided to other jurisdictions similar to Austin. Adjusting this target from 21 calendar days to 28 calendar days will improve the percentage of compliance but still leaves a significant gap from our recommendation that this new target be achieved a minimum of 90% of the time. Looking at the current percentage compliance of 25% for the 21-day target and an average of 40 days for initial reviews, it could be estimated that achieving the 90% compliance level would reveal a number closer to 60 days for initial reviews. These numbers indicate there is a serious shortage of staffing resources.

Comment [PZ39]: How about having a size or complexity table with some being 28 days, some 21 and some 14?

Comment [BR40]: I can do that. Maybe something similar to what we used in Kansas City based on valuation dollars.

10. Recommendation: The target turnaround time for major commercial projects exceeding \$1 Million in valuation should be 20 business days and met 90% of the time.

One of the difficulties associated with establishing appropriate staffing levels is the existence of a backlog of projects. As discussed elsewhere in the report, it is essential that the backlog be eliminated through the utilization of temporary outside plan review consultants. Until the backlog is eliminated, it is not possible to identify the actual cycle times for a typical project review. Also complicating this effort is the lack of any existing process to measure plan review workload units. The process of establishing appropriate staffing levels should be a matter of measuring the incoming workload and comparing the total of those units against staff's capacity to complete those units. It should be the Chief Plans Examiner's responsibility to develop and review weekly reports that compares the total workload against existing available resources. When the workload exceeds the available resources then actions, including the use of overtime, comp time or retaining outside plan review consultants, should be implemented before a backlog is created.

11. Recommendation: The existing backlog for commercial plan review needs to be eliminated through the use of outside plan review consultants.

12. Recommendation: The Chief Plans Examiner should develop a system of establishing plan review workload units.

13. Recommendation: The Chief Plans Examiner should periodically compare incoming workload units against existing staff's capacity to complete the work and adjust resources as needed to maintain target dates.

The City has recently completed a building permit fee study for the purpose of establishing the appropriate fees to assess customers to offset the cost of the services provided during the permit review and inspection process. In the most simple terms such a study would include determining which staff works on a specific type of permit, how much they cost the City and how long they must work to complete their assigned work for that permit. The City, by adopting this fee schedule, has contributed data that would help establish the duration of time that a plans examiner would spend on projects of varying size and complexity. This data should be consulted as a starting point in establishing plan review workload units.

14. Recommendation: The Chief Plans Examiner should consult the recent Fee Study as an aid in determining plan review workload units.

In addition to referring to the recent fee study for guidance on establishing plan review workload units, the invoices provided by outside plan review consultants will help identify the time duration required to complete plan reviews on those projects that they perform.

Comment [BR41]: I agree that using contract staff for building inspections has a variety of benefits. I'll add some discussion back in that section. I was reluctant to address specific recommendations for the other review sections until I got additional data about their on-time records. For example, Zoning reviews seem to be meeting their targets about 90% of the time based on the data in their table of performance standards above.

Comment [MM42]: There is no current way to recover those costs. And it is not a good idea for the customer to pay the consultant directly. Wren

Comment [PZ43]: This could take care of the building plan review. How about Zoning and the other four departments? And, why staff for building inspections and consultants for plan check?

15. Recommendation: The Chief Plans Examiner should consult invoices provided by plan review consultants to help establish plan review workload units.

It appears clear that additional plan review staff resources will be needed if the City is going to commit to achieving our recommended plan review turnaround times at least 90% of the time. Without a current method for measuring plan review workload, it is not possible to use that method to provide a specific recommendation for the number of additional plan review staff that will be needed to achieve the new turnaround standards. However, the process of establishing a plans examiner career ladder and initial recruitment of candidates could be commenced while the process of developing workload units is underway.

16. Recommendation: The Building Official should direct staff to complete plans examiner job description revisions and initiate a recruitment process concurrent with the development of plan review workload units.

In lieu of having the ability to utilize workload units to establish staffing level needs, the use of the previously discussed method of establishing a ratio between activity level and staffing (FTEs) as identified specific in Table __ (Performance Standards for Commercial Building Plan Review) should be considered. Using the data from this table, based on a benchmark year of 2011 then the Commercial Review Section should be staffed with 25.5 FTEs to be consistent with staffing ratio established in 2011. Achieving this staffing level will require the addition of five (5) new positions. Selecting 2011 as a benchmark year was based solely on the fact that it was the latest year for which we had complete data. To be consistent with the 2011 staffing ratio these position should be allocated across all of the positions in the Section.

17. Recommendation: The staffing level in the Commercial Review Section should be augmented with five (5) positions.

As discussed under the prior recommendation to add additional combination inspectors, we encourage jurisdictions to utilize qualified outside plan review consultants in conjunction with hiring additional full-time staff. The use of consultants can help address sudden increases in workload and provide support on day-to-day activities that can become very burdensome of existing staff when they are being asked to assume additional responsibilities associated with the hiring of new staff.

18. Recommendation: The Building Official should utilize the services of qualified plan review consultants to immediately respond to peak workload demands and to relieve staff during the training of new employees.

Comment [PZ44]: WOW, but I thought they were meeting standards? If so historical levels may not be meaningful. Also, I thought we were going to do this by contract plan check rather than staff/

Comment [MM45]: A new fee will be required to recover costs for contracting with 3rd party reviewers selected by the City. Third party reviewers should be selected and compensated by the City. Wren

D. POLICY ISSUES

Plans Examiner Career Ladder

There should also be a career ladder created for the Plans Examiner position that reflects the increased minimum qualifications for the positions. Jurisdictions frequently structure the career ladder for the Plans Examiners to start at a pay scale above the highest non-supervisor level in Inspections for residential plans examiners that are certified but not graduate engineers or architects (PE I). This classification would also apply for a Certified Commercial Plans Examiner reviewing trade disciplines. Graduate Engineers or Architects that have not been licensed but have qualified for Certification would be classified as a Plans Examiner II and Licensed Architect and Professional Engineers with Certifications would be classified as Plans Examiner III. An example of a career ladder for the position of Commercial Plans Examiner is provided below.

Table
Plans Examiner Career Ladder

Position Title	Qualifications	Relative Pay
Plans Examiner I (PE I)	ICC Certification – Not Engineer or Architect Grad	Inspector C + 5%
Plans Examiner II (PE II)	Grad Engineer or Architect w/Certification	Plans Examiner I + 10%
Plan Examiner III	P.E. or Lic Architect w/Certification	Plans Examiner II + 15%

19. Recommendation: ~~The A~~ career ladder should be ~~completed created~~ for the Commercial Plan Examiner position to reflect increasing levels of qualifications.

Many progressive jurisdictions have acknowledged the benefits of having plans examiners with prior field inspection experience. These individuals have a unique understanding of the kind of information that needs to be included on approved plans in order for the field inspector to be able to do their job. Creating a career ladder for the Plans Examiner position that would represent a pay increase for employees currently in the Inspector C classification would provide an incentive for these experienced inspectors to ultimately transition into an office position that is less physically challenging than field inspection.

20. Recommendation: Experienced Inspectors should be encouraged to pursue employment as a Plans Examiner as a means of extending their career with the City.

Comment [MM46]: This process began over a year ago but could not progress until the new AD/Building Official was hired.

E. PROCESS ISSUES

Commercial Intake Counter

The Commercial Plan Review Intake Counter is one of three locations where building plans may be submitted. This process can create confusion for the applicant and does not take advantage of the potential benefits of consolidating all plan intake staff in a single location. By consolidating all intake staff in a single location and providing appropriate cross-training the Department would benefit by being able to reassign staff quickly to respond to changes in workload demands and be able to better respond to both short and long-term staff absences. Due to current office space configuration constraints it may not be possible to implement such a change at this point but should be seriously considered in the future if office space constraints can be overcome.

21. Recommendation: Commercial Intake Counter staff should be cross-trained with other intake staff with the long-term goal to consolidate all intakes into single location.

22. Recommendation: The Department should hire a designer to create a space plan for One Texas Center that would consolidate all plan intake operations into a single public counter.

A problem identified while observing operations at the Permit Center was that customers were being advised by Commercial Plan Review Staff that their permits were ready to be issued by Permit Center staff when, in fact, there were remaining issues that should be resolved before they were sent to the Permit Center. This type of miscommunication results in significant frustration on the part of the customer and frequently results in serious delays for the applicant to obtain their permit(s). Frequently the cause of the delay is a failure on the part of the Plans Examiner to fully complete the required information on the permit application in the AMANDA system. In other cases, the property has outstanding expired permits that the current established procedures require be resolved before the permit can be issued. We believe these issues should be communicated to the applicant and resolved prior to sending the applicant to the Permit Center to discover these issues. During our on-site interviews we observed that the waiting period to see Permit Center staff was over two (2) hours. A partial explanation for these long wait times is that applicants arrive expecting to receive their permit but are confronted with additional issues that Permit Center staff is tasked to attempt to resolve.

23. Recommendation: Staff from the Commercial Intake counter should work with Plans Examiners to confirm all required information has been entered into AMANDA and there are no outstanding expired permits for the property before they advise the applicant that their permit application is ready to be issued.

Comment [C47]: It seems to us that this would be a difficult situation. The submittals for these 2 types of projects are significantly different and they are governed by much different technical codes as well as different zoning and site requirements in the Land Development Code. Co-locating might be an option but cross-training would require additional resources to make staff time available. Wren/Haught

Comment [MM48]: The department needs to move to a different building that better meets the needs of employees and general public

As an interim measure while a floor plan is prepared that consolidates all plan intake counters and as a means of relieving some of the excessive waiting times at the Permit Center, the Commercial Intake Counter should consider authorizing staff to issue permits directly from their counter. Fee collection could continue to be handled by the first floor cashier and approved plans could be picked up from the adjacent Document Sales counter.

24. Recommendation: Commercial Intake Counter staff should be authorized to issue commercial permits from their counter.

Completeness Check

One of the complaints expressed by Commercial Plans Examiners was the inconsistency they observed in the quality of the completeness checks that were being performed prior to acceptance of plans for formal review. The ability of the plan review process to work efficiently is highly dependent on the quality of the initial plan submittal. While the staff in the intake section is not responsible for performing plan reviews beyond confirming the project is located in an appropriate zone, they are responsible for verifying that a minimum amount of information has been incorporated into the plans. It should be the responsibility of the supervisor for this group to periodically audit the work performed by staff and to incorporate any observed deficiencies into future training programs and individual performance improvement plans.

25. Recommendation: The work performed by the intake staff should be audited periodically to confirm completeness checks are comprehensive and consistent.

Expedited Review

The customers desire to attempt to have their projects qualify for an Quick Turn-Around Review when the project clearly does not qualify demonstrates a service need that is not being met. Customers seem to be faced with a choice of a one-day plan review or a four-week plan review. We believe customers should have an option to request a quicker turnaround for any plan review if they are willing to pay the additional cost associated with providing this service. Many jurisdictions faced with this challenge utilize the temporary services of an outside plan review consultant. A fee should be established to provide this enhanced level of service. Other jurisdictions that have established expedited review program have established an additional fee either equal to the normal fee or by tracking actual costs as a means of recovering the additional costs for this service. The enhanced service is typically provided through the use of overtime for existing staff and/or the use of outside consultant services. Other Departments or Divisions that would also be expected to review and approve the plans in the reduced time frame should also establish a fee sufficient to cover their additional costs.

See the Department wide discussion of Expedited Review in Chapter III.

Comment [MM49]: We will need a separate document addressing Expedited Review per Scope of Services as tied to Council Resolution.

Comment [MM50]: Please acknowledge that additional office space will be needed.

Project Managers

A complaint expressed by customers and confirmed by staff is that correction lists provided by the various departments and agencies that review commercial plans are not reviewed for potential conflicts before being distributed to the applicant. The approach leaves the applicant in the difficult position of trying to resolve the conflicting corrections with each group separately. This is an outstanding example of silos existing within the Department and the process. We believe the Department should designate Project Managers to perform this service of resolving potential conflicting requirements between reviewing groups. We also believe a role of the Project Manager is to monitor the progress of projects assigned to them to confirm that appropriate progress is being made to meet the target timeframes for review completion. In the case of Building Permits we believe the appropriate Project Manager should be the Plan Examiner assigned to the project.

26. Recommendation: Plans Examiners should be designated to perform Project Manager responsibilities for commercial projects.

One of the key components of a Project Manager program is the assignment of appropriate authority to the Project Manager to initiate change in the review process. This approach has been successfully implemented in other organizations by creating Memorandums of Understandings (MOUs) that define the expectations of all participants and identifies the steps the Project Manager should take to help ensure the terms of the mutual agreements are honored. An example of terms of the agreement would be for all parties committing to complete plan reviews within a designated timeframe.

27. Recommendation: Existing Memorandums of Understanding (MOUs) should be updated as necessary to clearly identify performance expectations and the authority of designated Project Manager in seeking compliance with terms of the MOU.

Quality Control

It is clear from the number of complaints received from the customers and staff that there is a need to improve the overall quality of plan review services. While the section has numerous checklist and procedures in place, there is no program in place to periodically audit the employee's work to confirm that plan reviews are being performed in a uniform and consistent manner. The level of inconsistency among plans examiners has reached a level that has resulted in customers routinely attempting to "game the system" in order to avoid some plans examiners. Customers stated to us that they will instruct their employees to delay submitting a set of plans on a specific day if there is a chance that the project will be assigned to a plans examiner that they have had difficulty with in the past. As another example of "gaming the system", some designers routinely request a pre-submittal meeting with a specific plans examiner because it has been the Department's practice to automatically assign that project to the plans examiner who attended the pre-

Comment [C51]: This would be difficult to accomplish with our current staffing levels.
Wren/Haught

Comment [BR52]: This is another discussion that might be better addressed at the front of the report under the general title of Interdepartmental Cooperation and Expectations.

Comment [PZ53]: I assume this will relate to how we handle all the external departments. Also, are there other PDRD sections that get involved in the review?

submittal meeting. Customers have rightfully determined that by utilizing this pre-submittal meeting system they are virtually guaranteed that their project will be assigned to the plans examiner of their choice.

28. Recommendation: The Chief Plans Examiner needs to modify the process of assigning projects to Plans Examiners in order to eliminate the practice of customers selecting the Plans Examiner for their project.

29. Recommendation: The Chief Plans Examiner needs to direct the Plan Review Coordinators to periodically conduct audits of the reviews completed by their assigned Plan Examiners.

One of the complaints consistently expressed by customers in confidential surveys and focus group meetings was the lack of comprehensiveness of initial plan reviews. Customers believe that plans Examiners, due to workload backlog, rush through initial plan reviews in order to try and meet turnaround times and only identify a few required corrections as the basis for rejecting the plans. After the designer has made the identified corrections and resubmitted the plans the Plans Examiner then performs a more comprehensive review and identifies more items, many of which should have been identified during the initial check. This process is not only very frustrating for the designer but it also tends to add additional plan review cycles and therefore costs to the project.

30. Recommendation: All first reviews to be comprehensive and included in the Plan Review Audit Program.

For the Audit Program to be effective, the observations obtained during the audit program should be incorporated into future in-house training programs and reflected on individual employee performance evaluations.

31. Recommendation: Observations for the Audit Program should be used to improve the in-house training program and individual performance.

This report is recommending the use of outside plan review consultants to reduce the current backlog and to provide short-term plan review services during the process of recruiting additional plan review staff. An audit program to confirm the quality of the services they provide, particularly when enforcing code amendments unique to Austin should also accompany the use of consultants.

32. Recommendation: The Plan Review Audit Program should include a process for periodically reviewing the work performed by outside plan review consultants, particularly as it applies to enforcing local amendments.

Comment [MM54]: Please note that Commercial Review will need additional staff to allow for audit program. Please ensure staffing is included in your overall recommendations for additional resources.

Quick Turn-Around Plan Reviews

We strongly support the need to have a program that accommodates the needs of customers submitting minor projects. This type of program is typically designed to allow customers to avoid submitting their projects through the regular system that takes a very long time to receive the review. While there is an additional charge to participate in this program (\$47), the ability have the plans reviewed in one day versus 7 days or 35+ days provides a substantial incentive for customers to press hard to have their projects qualified under this program. Unfortunately, this environment has led some customers to suggest that sometimes staff favoritism may play a role in determining whether a project would be allowed to participate in the process. Some customers complain that this is more likely to occur when the submitting customer is a former employee of the Department. To maintain trust with the public, it is essential that claims of potential favoritism be investigated and corrective actions taken as appropriate for the situation. It would also be useful to have the supervisor include the subject of projects qualifying for Quick Turn-Around in a future in-house training program.

33. *Recommendation:* The Chief Plans Examiner should monitor the process used to determine when projects qualify for Quick Turn-Around Reviews to confirm the absence of any staff favoritism.

The staff assigned to perform Quick Turn-Around Reviews is the same staff performing all other commercial plans reviews. These projects, though numerous, typically are of limited complexity. Most other jurisdictions assign these types of projects to plans examiners with limited experience or qualifications. Currently there is only one classification for Plans Examiners. Under our recommendation for a Plans Examiner career ladder, these small projects could be assigned to employees in the Plans Examiner I classification which would free up more qualified plans Examiners to focus their attention on performing the plan reviews of more complex projects that are commensurate with their skill level.

34. *Recommendation:* With the creation of a career ladder for Plans Examiners, Quick Turn-Around Reviews should be assigned exclusively to employees in the Plans Examiner I position.